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Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 3
ITAAC Closure Notification on Completion of ITAAC 2.3.02.14 [Index Number 317]

Ladies and Gentlemen:

In accordance with 10 CFR 52.99(c)(1), the purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of Vogtle Electric Generating Plant (VEGP) Unit 3 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.3.02.14 [Index Number 317]. This ITAAC verifies that the Chemical and Volume Control System (CVS) nonsafety-related piping located inside containment and designated as reactor coolant pressure boundary, as identified in Table 2.3.2-2, has been designed to withstand a seismic design basis event and maintain structural integrity. The closure process for this ITAAC was based on the guidance described in Nuclear Energy Institute (NEI) 08-01, *Industry Guideline for the ITAAC Closure Process under 10 CFR Part 52*, which was endorsed by the NRC in Regulatory Guide 1.215.

This letter contains no new NRC regulatory commitments. Southern Nuclear Operating Company (SNC) requests NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99.

If there are any questions, please contact Kelli A. Roberts at 706-848-6991.

Respectfully submitted,

Michael J. Yox
Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3
Completion Plan for Uncompleted ITAAC 2.3.02.14 [Index Number 317]

MJY/JRV/sfr

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Southern Nuclear Operating Company
ND-21-0227
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3
Completion of ITAAC 2.3.02.14 [Index Number 317]

ITAAC Statement

Design Commitment

14. The nonsafety-related piping located inside containment and designated as reactor coolant pressure boundary, as identified in Table 2.3.2-2, has been designed to withstand a seismic design basis event and maintain structural integrity.

Inspections, Tests, Analyses

Inspection will be conducted of the as-built piping as documented in the CVS Seismic Analysis Report.

Acceptance Criteria

The CVS Seismic Analysis Reports exist for the non-safety related piping located inside containment and designated as reactor coolant pressure boundary as identified in Table 2.3.2-2.

ITAAC Determination Basis

An inspection was conducted to verify that the nonsafety-related Chemical and Volume Control System (CVS) piping located inside containment and designated as reactor coolant pressure boundary, as identified in VEGP Combined License (COL) Appendix C Table 2.3.2-2 (Attachment A), has been designed to withstand a seismic design basis event and maintain structural integrity. The inspection confirms that a seismic analysis for the as-built piping identified in Attachment A is documented in the VEGP Unit 3 CVS Seismic Analysis Report. Information associated with the VEGP Unit 3 CVS Seismic Analysis Report is discussed in VEGP 3&4 Updated Final Safety Analysis Report (UFSAR) Section 5.2.1.1, "Compliance with 10 CFR 50.55a", (Reference 1) and supplemented by UFSAR Section 5.2.1.3, "Alternate Classification", (Reference 2).

The design of the nonsafety-related (American Society of Mechanical Engineers (ASME) B31.1 Piping Class D) CVS piping identified in Attachment A was summarized in the Vogtle Unit 3 Chemical Volume Control System (CVS) ITAAC Requirement As-built Assessment (CVS Seismic Analysis Report) (Reference 3). Inspections were performed following installation of the piping identified in Attachment A to confirm that the as-built piping was installed per design report specifications. Inspection non-conformances are documented and dispositioned to ensure the nonsafety-related as-built CVS piping identified in Attachment A was designed and constructed to withstand a seismic design basis event and maintain structural integrity. Vogtle Unit 3 Chemical Volume Control System (CVS) ITAAC Requirement As-built Assessment (CVS Seismic Analysis Report) (Reference 3) documents the seismic analysis for the as-built piping in Attachment A using the criteria in Reference 1 and confirms that the nonsafety-related as-built CVS piping located inside containment and designated as reactor coolant pressure boundary was designed to withstand a seismic design basis event and maintain structural integrity. The Vogtle Unit 3 Chemical Volume Control System (CVS) ITAAC Requirement As-built Assessment (CVS Seismic Analysis Report) (Reference 3) for the CVS piping lines identified in Attachment A for Unit 3 are available for NRC inspection as part of the ITAAC Completion Package (Reference 4).

ITAAC Finding Review

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all ITAAC findings pertaining to the subject ITAAC and associated corrective actions. This review found no relevant ITAAC findings associated with this ITAAC. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC 2.3.02.14 for Unit 3 (Reference 4) and is available for NRC review.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC 2.3.02.14 was performed for VEGP Unit 3 and that the prescribed acceptance criteria were met.

Systems, structures, and components verified as part of this ITAAC are being maintained in their as designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

References (available for NRC inspection)

1. VEGP 3&4 Updated Final Safety Analysis Report, Section 5.2.1.1, Compliance with 10 CFR 50.55a

2. VEGP 3&4 Updated Final Safety Analysis Report, Section 5.2.1.3, Alternate Classification

3. SV3-CVS-Z0R-001, Rev. 1, "Vogtle Unit 3 Chemical and Volume Control System (CVS) ITAAC Requirement As-built Assessment (CVS Seismic Analysis Report)"

4. 2.3.02.14-U3-CP-Rev0, ITAAC Completion Package

5. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A: *Excerpts from COL Appendix C Table 2.3.2-2

Line Name*	Line Number*	CVS Seismic Analysis Report
CVS Supply Line to Regenerative Heat Exchanger	L002	SV3-CVS-Z0R-001
CVS Return Line from Regenerative Heat Exchanger	L018	SV3-CVS-Z0R-001
CVS Line from Regenerative Heat Exchanger to Letdown Heat Exchanger	L003	SV3-CVS-Z0R-001
CVS Lines from Letdown Heat Exchanger to Demin. Tanks	L004 L005 L072	SV3-CVS-Z0R-001
CVS Lines from Demin Tanks to RC Filters and Connected Lines	L006(1) L007(1) L010(1) L011(1) L012 L015(1) L016(1) L020 L021 L022 L023(1) L024(1) L029 L037	SV3-CVS-Z0R-001
CVS Lines from RC Filters to Regenerative Heat Exchanger	L030 L031 L034 L050 L073	SV3-CVS-Z0R-001
CVS Resin Fill Lines to Demin. Tanks	L008(1) L013(1) L025(1)	SV3-CVS-Z0R-001

Note:

1. Special seismic requirements include only the portion of piping normally exposed to RCS pressure. Piping beyond the first normally closed isolation valve is evaluated as seismic Category II piping extending to either an interface anchor, a rigid support following a six-way anchor, or the last seismic support of a rigidly supported region of the piping system as necessary to satisfy analysis requirements for piping connected to seismic Category I piping systems.